

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
RAS Citron, LLC 130 Clinton Road, Suite 202 Fairfield, NJ 07004 Telephone Number 973-575-0707 Attorneys for Secured Creditor Ocwen Loan Servicing, LLC as servicer for HSBC Bank USA, National Association, As Trustee for Deutsche Alt-B Securities Mortgage Loan Trust, Series 2007-AB1 Mortgage Pass-Through Certificates Aleisha C. Jennings, Esq. 049302015	CASE NO.: 18-28143-KCF CHAPTER 13 Objection to Confirmation of Debtor's Chapter 13 Plan
In Re: Amnon Tamam, Debtor.	

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

Ocwen Loan Servicing, LLC as servicer for HSBC Bank USA, National Association, As Trustee for Deutsche Alt-B Securities Mortgage Loan Trust, Series 2007-AB1 Mortgage Pass-Through Certificates ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan (DE # 12), and states as follows:

1. Debtor, Amnon Tamam ("Debtor"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on September 11, 2018.
2. Secured Creditor holds a security interest in the Debtor's real property located at 219 Wainwright Street, Newark, NJ 07112, by virtue of a Mortgage recorded on July 31, 2006 in Book 11418, at Page 164 of the Public Records of Essex County, NJ. Said Mortgage secures a Note in the amount of \$239,000.00.
3. The Debtor filed a Chapter 13 Plan on September 21, 2018.
4. The Plan proposes to cure Secured Creditor's claim through sale of the real property; however, the Plan fails to provide that Debtor's total debt will be satisfied from the sale.

Secured Creditor's claim has a total payoff of \$167,753.15. Secured Creditor objects to any plan that fails to state that \$167,753.15 be paid through the sale of real property.

5. The Plan does not appear feasible due to inadequate treatment of Secured Creditor's claim. Thus, the plan violates the provisions of 11 U.S.C. § 1325(a)(3) and cannot be confirmed.

WHEREFORE, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtor's Plan, and for such other and further relief as the Court may deem just and proper.

RAS Citron, LLC
Attorney for Secured Creditor
130 Clinton Road, Suite 202
Fairfield, NJ 07004
Telephone Number 973-575-0707

By: /s/Aleisha C. Jennings
Aleisha C. Jennings, Esquire
NJ Bar Number 049302015
Email: ajennings@rasnj.com

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CERTIFICATION OF SERVICE

1. I, Aleisha C. Jennings, represent Ocwen Loan Servicing, LLC as servicer for HSBC Bank USA, National Association, As Trustee for Deutsche Alt-B Securities Mortgage Loan Trust, Series 2007-AB1 Mortgage Pass-Through Certificates in this matter.
2. On 10/24/2018, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below: **Objection to Confirmation of Debtor's Chapter 13 Plan**
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

10/24/2018

RAS Citron, LLC
Attorney for Secured Creditor
130 Clinton Road, Suite 202
Fairfield, NJ 07004

Telephone Number 973-575-0707

By: /s/Aleisha C. Jennings
 Aleisha C. Jennings, Esquire
 NJ Bar Number 049302015
 Email: ajennings@rasnj.com

<u>Name and Address of Party Served</u>	<u>Relationship of Party to the Case</u>	<u>Mode of Service</u>
Robert C. Nisenson Robert C. Nisenson, LLC 10 Auer Court Suite E East Brunswick, NJ 08816	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)
Amnon Tamam 448 Meade Court East Brunswick, NJ 08816	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)
Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)